

### **REMARKS**

Claims 1, 3-12 and 14-19 are now pending in the application. Claims 1-19 stand rejected. Claims 2 and 13 have been cancelled. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the amendments and remarks contained herein.

### **SPECIFICATION**

The specification stands objected to for certain informalities. Applicant has amended the Abstract according to the Examiner's suggestions. Therefore, reconsideration and withdrawal of this objection are respectfully requested.

### **REJECTION UNDER 35 U.S.C. § 102**

Claims 1, 5, 7, 9, 11-12, 15, 17 and 19 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Monroe (U.S. Pat. No. 6,392,692, hereinafter Monroe). This rejection is respectfully traversed.

Applicant notes independent claim 1 has been amended to include "wherein the mobile security manager is operable to perform security response activities in accordance with a security policy resident on the mobile network platform." Claim 12 has been amended to include "wherein the step of performing a security response activity further comprises applying the security response activity in accordance with a security policy, where the security policy is defined as a plurality of predefined security intrusion events and a corresponding security response for each of said plurality of security intrusion events." Furthermore, independent Claim 19 was amended to include "wherein the security policy is defined as a plurality of predefined security intrusion events and a corresponding security response for each of said plurality of security

intrusion events." As noted by the Examiner, Monroe does not teach or suggest these features as claimed.

**REJECTION UNDER 35 U.S.C. § 103**

Claims 2-3 and 13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Monroe in view of Manganaris et al. (U.S. Publication No. 2002/0082886 A1, hereinafter Manganaris). Claim 4 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Monroe in view of Manganaris in further view of Schuba et al. (U.S. Patent No. 6,725,378). Claims 6, 10 and 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Monroe in view of ISA "*An Introduction to Intrusion Detection Assessment for System and Network Security Management*." Claims 8, 14 and 18 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Monroe in view of Schuba et al. (U.S. Patent No. 6,725,378). These rejections are respectfully traversed.

At the outset, Applicant encloses herewith a Declaration under 37 C.F.R. § 1.131 and associated evidence under 37 C.F.R. § 1.131 stating that the present invention was at least conceived in this country prior to December 27, 2000, the filing date of Manganaris (U.S. Publication No. 2002/0082886A1), and thereafter that efforts were diligently made to reduce the invention to practice. Therefore, Manganaris is not a valid prior art reference to the presently pending claims and Applicant respectfully requests withdrawal of the Examiner's rejections of the claims based at least in part on Manganaris.

Applicant notes Claims 3, 4, 6, 8, 10, 14, 16 and 18 all depend from independent Claims 1 or 12. As stated previously, Applicant believes Claims 1 and 12 are

patentable and in condition for allowance. Accordingly, Applicant believes Claims 3, 4, 6, 8, 10, 14, 16 and 18 are also patentable and in condition for allowance. Reconsideration and withdrawal of these rejections are respectfully requested.

**CONCLUSION**

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

Dated: Oct. 20, 2004

By:   
Mark D. Elchuk, Reg. No. 33,686

HARNESS, DICKEY & PIERCE, P.L.C.  
P.O. Box 828  
Bloomfield Hills, Michigan 48303  
(248) 641-1600

MDE/EKS/ps